## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

<b>T</b>		
ln	ra	•
111	10	

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA Title III

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, et al.,

(Jointly Administered)

Debtors.<sup>1</sup>

# AMBAC ASSURANCE CORPORATION'S INFORMATIVE MOTION TO APPEAR AT THE JUNE 17, 2022 DISCLOSURE STATEMENT HEARING

Ambac Assurance Corporation ("Ambac") hereby submits this informative motion in compliance with the *Order Regarding Procedures for June 17, 2022 Disclosure Statement Hearing* [ECF No. 21068<sup>2</sup>], and respectfully states as follows:

1. Dennis F. Dunne (ddunne@milbank.com) and Atara Miller (amiller@milbank.com) of Milbank LLP will appear on behalf of Ambac at the June 17, 2022 Disclosure Statement Hearing (the "Hearing").

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

<sup>&</sup>lt;sup>2</sup> "ECF No." refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

Case:17-03283-LTS Doc#:21148 Filed:06/08/22 Entered:06/08/22 13:53:49 Desc: Main Document Page 2 of 4

2. Mr. Dunne and Ms. Miller may speak in connection with the *Motion of the Puerto* 

Rico Highways and Transportation Authority for an Order (I) Approving Disclosure Statement,

(II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation

Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving

Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting

Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote

Tabulation Procedures (ECF No. 20654), the Motion of the Puerto Rico Highways and

Transportation Authority for an Order Establishing, Among Other Things, Procedures and

Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith (ECF

No. 20655), and the Motion for Approval of Second Amended and Restated Stipulation and Agreed

Order Regarding the Disputed Funds in the HTA Bond Service Accounts, Redemption Accounts

and Reserve Accounts (ECF No. 20987).

3. Mr. Dunne and Ms. Miller reserve the right to be heard on any matter raised by any

party at the Hearing as concerns Ambac related to the Title III cases, or any adversary proceeding

pending the Title III cases, or the interests of Ambac.

WHEREFORE, Ambac respectfully requests that the Court take notice of the foregoing.

[Remainder of Page Intentionally Omitted]

Dated: June 8, 2022 San Juan, Puerto Rico

#### FERRAIUOLI LLC

By: /s/ Roberto Cámara-Fuertes

Roberto Cámara-Fuertes (USDC-PR No.

219002)

Sonia Colón (USDC-PR No. 213809)

221 Ponce de León Avenue, 5th Floor

San Juan, PR 00917

Telephone: (787) 766-7000 Facsimile: (787) 766-7001 Email: rcamara@ferraiuoli.com

scolon@ferraiuoli.com

#### MILBANK LLP

By: /s/ Atara Miller

Dennis F. Dunne (admitted pro hac vice)

Atara Miller (admitted pro hac vice)

Grant R. Mainland (admitted pro hac vice)

John J. Hughes, III (admitted pro hac vice)

55 Hudson Yards

New York, NY 10001

Telephone: (212) 530-5000

Facsimile: (212) 530-5219 Email: ddunne@milbank.com

amiller@milbank.com

gmainland@milbank.com

jhughes2@milbank.com

### Attorneys for Ambac Assurance Corporation

[Remainder of Page Intentionally Omitted]

### **CERTIFICATE OF SERVICE**

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

/s/ Roberto Cámara-Fuertes

Roberto Cámara-Fuertes (USDC-PR No. 219002) 221 Ponce de León Avenue, 5th Floor San Juan, PR 00917

Telephone: (787) 766-7000 Facsimile: (787) 766-7001 Email: rcamara@ferraiuoli.com